

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

2016 JUL 18 PM 3:45

CLERK OF COURT

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SALVADORA ORTIZ and THOMAS  
SCOTT,

Plaintiffs,

vs.

AMERICAN AIRLINES, INC., THE  
AMERICAN AIRLINES PENSION ASSET  
ADMINISTRATION COMMITTEE and  
AMERICAN AIRLINES FEDERAL  
CREDIT UNION,

Defendants.

CIVIL ACTION NO. 4:16-cv-00151-A

**UNOPPOSED MOTION FOR ORDER PRELIMINARILY APPROVING (I)  
CONDITIONAL CERTIFICATION OF THE SETTLEMENT CLASSES; (II)  
APPOINTMENT OF LEAD AND CLASS COUNSEL; (III) PRELIMINARY APPROVAL  
OF SETTLEMENT; AND (IV) APPROVAL OF FORM AND MANNER OF NOTICE**

Plaintiffs Salvadora Ortiz and Thomas Scott ("Plaintiffs") plaintiffs in the above-captioned class action lawsuit (the "Action"), respectfully move the Court for entry of an order: (1) conditionally certifying the Settlement Classes;<sup>1</sup> (2) appointing Lead and Class Counsel; (3) preliminarily approving the Settlement; and (4) approving the form and manner of notice to Class Members of the Settlement. ("Preliminary Approval Order").

Plaintiffs respectfully request that the Court enter the above-described order to preliminarily approve the settlement negotiated by Plaintiffs and Defendants in this action. Plaintiffs and Defendants seek to compromise and thereby settle all issues and claims alleged in the Complaint filed as Docket No. 1 in the Action (the "Complaint") on behalf of all members of the proposed Settlement Classes. To that end, Plaintiffs and Defendants have agreed to a settlement

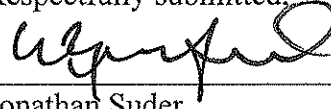
<sup>1</sup> Capitalized terms herein have the definitions set forth in the Settlement Agreement and Release, which is submitted herewith as Exhibit 1 to Plaintiff's Appendix.

of the Action that Class Counsel have determined will provide fair and adequate relief to the proposed Settlement Classes for the claims alleged in the Complaint (which are brought under the Employee Retirement Income Security Act ("ERISA")) during the period February 10, 2010 to the date of the Preliminary Approval Order ("Relevant Period").

This motion is supported by an accompanying memorandum of law, declaration, and exhibits, including the Settlement Agreement, a proposed preliminary approval order, a proposed class notice, and a proposed final judgment.

Dated: July 18, 2016

Respectfully submitted,



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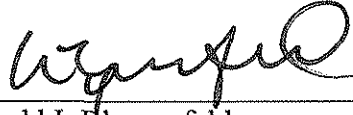
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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

I certify that on July 14, 2016, my co-counsel John J. Nestico, conferred with Shannon Barrett of O'Melveny & Myers LLP (on behalf of the Defendants American Airlines, Inc. and the American Airlines Pension Asset Administration Committee), and Jonathan Neerman of Jackson Walker L.L.P. (on behalf of the American Airlines Federal Credit Union) and Defendants are unopposed to the relief sought in this Motion.



Todd I. Blumenfeld

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 18<sup>th</sup> day of July, 2016, I served a copy of the above and foregoing document, via first class mail, on the following:

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